## **EXHIBIT 5**

	Page 1
1	
2	HIGHLY CONFIDENTIAL
3	IN THE UNITED STATES DISTRICT COURT
	FOR THE EASTERN DISTRICT OF VIRGINIA
4	ALEXANDRIA DIVISION
	x
5	UNITED STATES, et al.,
б	Plaintiffs,
7	vs. Case No.
	1:23-cv-000108
8	GOOGLE LLC,
9	Defendant.
	x
10	
11	
12	HIGHLY CONFIDENTIAL
13	VIDEOTAPED DEPOSITION OF LUKE LAMBERT
14	New York, New York
15	Tuesday, August 29, 2023
16	9:37 a.m.
17	
18	
19	
20	
21	
22	
23	Reported by:
	Jennifer Ocampo-Guzman, CRR, CLR
24	Job No. CS6079449
25	

800-567-8658 973-410-4098

1	Page 2	1	Page 4
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$		2	APPEARANCES (Continued):
		3	AFFEARANCES (Continued).
3			LATHAM & WATKINS
4		4	
5		5	Attorneys for Omnicom Holdings and the
6		6	Deponent
7		7	505 Montgomery Street, Suite 2000
8	August 29, 2023	8	San Francisco, California 94111
9	9:37 a.m.	9	BY: NIALL LYNCH, ESQ.
10		10	AARON CHIU, ESQ.
11		11	KAILEN MALLOY, ESQ., (via Zoom)
12	HIGHLY CONFIDENTIAL	12	
13	Videotaped Deposition of LUKE	13	ALSO PRESENT:
14	LAMBERT, held at the offices of Latham	14	MARCELO RIVERA, Videographer
15	& Watkins, LLP, 1271 Avenue of the	15	•
16	Americas, New York, New York, pursuant	16	
17	to subpoena, before Jennifer	17	
18	Ocampo-Guzman, a Certified Realtime	18	
19	Shorthand Reporter and Notary Public of	19	
20	the State of New York.	20	
21	the state of New Tork.	21	
$\begin{vmatrix} 21\\22 \end{vmatrix}$		22	
23		23	
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25		25	
23		23	
	Page 3		
	8	1	Page 5
1		1	HIGHLY CONFIDENTIAL
2	APPEARANCES:	2	HIGHLY CONFIDENTIAL THE VIDEOGRAPHER: Good morning.
3	APPEARANCES:	2 3	HIGHLY CONFIDENTIAL THE VIDEOGRAPHER: Good morning. We are going on the record at 9:37 a.m.,
2 3 4	A P P E A R A N C E S:  UNITED STATES DEPARTMENT OF JUSTICE	2 3 4	HIGHLY CONFIDENTIAL THE VIDEOGRAPHER: Good morning. We are going on the record at 9:37 a.m., on August 29, 2023. Please note that
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2 (Pages 2 - 5)

		11 11	
	Page 218		Page 220
1	LAMBERT - HIGHLY CONFIDENTIAL	1	LAMBERT - HIGHLY CONFIDENTIAL
2	billing and maintenance tool.	2	MS. CLEMONS: Objection, form,
3	Q. When you send the insertion order	3	foundation.
4	to yourselves, is there a pay term that you	4	A. Yes.
5	are obligated to pay Google?	5	Q. Are the Omnicom agencies that work
6	A. It is the pay term. There is no	6	with CMS billed by Google for the services
7	change in the pay term.	7	that Omnicom agencies use on behalf of CMS?
8	Q. To your knowledge, does the Army	8	MS. CLEMONS: Objection, form,
9	contract directly with Google for the	9	foundation.
10	services that Omnicom uses from Google on the	10	A. Is your question, does Google bill
11	Army's behalf?	11	Omnicom?
12	MS. CLEMONS: Objection, form.	12	Q. Yes.
13	A. To my knowledge, no.	13	A. Yes.
14	Q. Do invoices for Google services	14	Q. Thank you.
15	provided to Omnicom for the Army	15	Does Omnicom pay Google directly
16	MS. MORGAN: Let me ask that a	16	for the services used on behalf of CMS?
17	different way.	17	MS. CLEMONS: Objection, form.
18	Q. Do invoices for Google services	18	A. Yes.
19	used by Omnicom agencies on behalf of the	19	Q. And does Omnicom pass on those
20	Army come to Omnicom?	20	costs to CMS?
21	A. Yes.	21	A. Yes.
22	Q. Does Omnicom pass those costs on to	22	Q. I'm going to ask you the same
23	the Army?	23	questions about NHTSA.
24	A. Yes.	24	Are you familiar with the NHTSA
25	Q. And does Omnicom pay Google for the	25	contracts between are you familiar with
-			<u> </u>
1	Page 219 LAMBERT - HIGHLY CONFIDENTIAL	1	Page 221 LAMBERT - HIGHLY CONFIDENTIAL
2	services Google provides to Omnicom customers	2	the contracts between NHTSA and the Omnicom
3	under the evergreen Google agreement?	3	agencies that work with NHTSA?
4	MS. CLEMONS: Objection, form.	4	A. I do not know the scopes.
5	A. Omnicom pays Google.	5	Q. Do you know if NHTSA or if
6	Q. Does Omnicom pay Google for	6	Omnicom uses Google products on behalf of
7	services used by Omnicom on the Army's	7	NHTSA?
	behalf?	8	
8		9	<ul><li>A. They do.</li><li>Q. And what are the products?</li></ul>
9	<ul><li>A. Omnicom pays Google.</li><li>Q. Are you familiar with the contracts</li></ul>	10	<ul><li>Q. And what are the products?</li><li>A. DV360, Ads and Campaign Manager.</li></ul>
10			
11 12	between Omnicom agencies and CMS?  A. No.	11 12	Q. Does Google, does Omnicom contract
			directly with Google for use of those tools
13	Q. Do you have any reason to think	13	on NHTSA's behalf?
14	that well, do the Omnicom agencies that	14	A. Yes.
15	work with CMS use Google products on behalf	15	MS. CLEMONS: Objection, form.
16	of CMS?	16	Q. Does Omnicom pay Google directly
17	MS. CLEMONS: Objection, form,	17	for use of those tools on NHTSA's behalf?
18	foundation.	18	MS. CLEMONS: Objection, form.
19	A. Yes.	19	A. Yes.
	O What and 1 + 9	// 1	Q. Does Omnicom pass those costs on to
20	Q. What products?	20	
20 21	A. DV360 and Campaign Manager and Ads	21	NHTSA?
20 21 22	<ul><li>A. DV360 and Campaign Manager and Ads</li><li>360. So programmatic, ad serving and search.</li></ul>	21 22	NHTSA? A. Yes.
20 21 22 23	<ul><li>A. DV360 and Campaign Manager and Ads</li><li>360. So programmatic, ad serving and search.</li><li>Q. Do the Omnicom agencies that work</li></ul>	21 22 23	NHTSA? A. Yes. Q. Do you know whether NHTSA or CMS
20 21 22	<ul><li>A. DV360 and Campaign Manager and Ads</li><li>360. So programmatic, ad serving and search.</li></ul>	21 22	NHTSA? A. Yes.

56 (Pages 218 - 221)

	Page 222		Page 224
1	LAMBERT - HIGHLY CONFIDENTIAL	1	LAMBERT - HIGHLY CONFIDENTIAL
2	A. I don't know what their GMP	2	contracts I believe that we had. You have
3	contract entails.	3	some of my e-mails from that time period.
4	Q. Are you aware that between the fall	4	Q. Did you participate in the process
5	of 2019 through 2021, the Department of	5	of collecting documents for the DOJ
6	Justice conducted an investigation into	6	investigation?
7	Google's ad tech business?	7	A. Yes.
8	MS. CLEMONS: Objection, form.	8	Q. What was your role?
9	A. I'm sorry. Can you	9	A. Saving my documents.
10	Q. New topic.	10	Q. Good one.
11	Are you aware that between the fall	11	Are you aware that the Department
12	of 2019 throughout 2021, the Department of	12	of Justice has brought a litigation against
13	Justice conducted an investigation into	13	Google in the Eastern District of Virginia
14	Google's ad tech business?	14	related to its ad tech business?
15	MS. CLEMONS: Same objection.	15	A. I don't know what that means.
16	A. Yes.	16	Q. Do you know that the Department of
17	Q. Did you meet with the Department of	17	Justice sued Google related to its ad tech
18	Justice on a voluntary basis at any time	18	business?
19	between 2019 and 2021?	19	A. Yes.
20	MS. CLEMONS: Objection, form.	20	Q. We talked about whether you met
21	A. No.	21	with the Department of Justice between 2019
22	Q. Do you know if anyone at Omnicom	22	and 2021. Have you met with the Department
23	met with the Department of Justice during	23	of Justice since 2021?
24	that two-year period, between 2019 and 2021?	24	A. Yes.
25	A. I do not know.	25	Q. How many times?
1 2	Page 223 LAMBERT - HIGHLY CONFIDENTIAL Q. You don't know one way or the other	1 2	Page 225 LAMBERT - HIGHLY CONFIDENTIAL A. Two.
3	or	3	Q. When was the first time?
4	A. I just don't know.		O. when was the first time?
· +		4	
	•	4 5	A. Within the last three months.
5	Q. Did Omnicom produce documents to	5	<ul><li>A. Within the last three months.</li><li>Q. How long was that meeting?</li></ul>
5 6	Q. Did Omnicom produce documents to the Department of Justice during that period	5 6	<ul><li>A. Within the last three months.</li><li>Q. How long was that meeting?</li><li>A. Maybe 45 minutes.</li></ul>
5 6 7	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?	5 6 7	<ul><li>A. Within the last three months.</li><li>Q. How long was that meeting?</li><li>A. Maybe 45 minutes.</li><li>Q. Was it in person?</li></ul>
5 6 7 8	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes.	5 6 7 8	<ul><li>A. Within the last three months.</li><li>Q. How long was that meeting?</li><li>A. Maybe 45 minutes.</li><li>Q. Was it in person?</li><li>A. No.</li></ul>
5 6 7 8 9	<ul> <li>Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?</li> <li>A. Yes.</li> <li>Q. Were those documents produced in</li> </ul>	5 6 7 8 9	<ul><li>A. Within the last three months.</li><li>Q. How long was that meeting?</li><li>A. Maybe 45 minutes.</li><li>Q. Was it in person?</li><li>A. No.</li><li>Q. Was it over the phone?</li></ul>
5 6 7 8 9 10	<ul> <li>Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?</li> <li>A. Yes.</li> <li>Q. Were those documents produced in response to a subpoena or other legal</li> </ul>	5 6 7 8 9 10	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> </ul>
5 6 7 8 9 10 11	<ul> <li>Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?</li> <li>A. Yes.</li> <li>Q. Were those documents produced in response to a subpoena or other legal process?</li> </ul>	5 6 7 8 9 10 11	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> </ul>
5 6 7 8 9 10 11 12	<ul> <li>Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?</li> <li>A. Yes.</li> <li>Q. Were those documents produced in response to a subpoena or other legal process?</li> <li>A. Yes.</li> </ul>	5 6 7 8 9 10 11 12	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> <li>A. It was.</li> </ul>
5 6 7 8 9 10 11 12 13	<ul> <li>Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?</li> <li>A. Yes.</li> <li>Q. Were those documents produced in response to a subpoena or other legal process?</li> <li>A. Yes.</li> <li>Q. Did Omnicom produce any document</li> </ul>	5 6 7 8 9 10 11 12 \$13	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> <li>A. It was.</li> <li>Q. Who else attended the interview?</li> </ul>
5 6 7 8 9 10 11 12 13 14	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena?	5 6 7 8 9 10 11 12 \$13	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> <li>A. It was.</li> <li>Q. Who else attended the interview?</li> <li>A. Myself, Megan Frisbie, Danielle</li> </ul>
5 6 7 8 9 10 11 12 13 14 15	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena? A. I do not know.	5 6 7 8 9 10 11 12 \$13 14	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> <li>A. It was.</li> <li>Q. Who else attended the interview?</li> <li>A. Myself, Megan Frisbie, Danielle</li> <li>Atanda.</li> </ul>
5 6 7 8 9 10 11 12 13 14 15 16	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know. Q. Do you know what the documents are	5 6 7 8 9 10 11 12 \$13 14 15 16	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> <li>A. It was.</li> <li>Q. Who else attended the interview?</li> <li>A. Myself, Megan Frisbie, Danielle</li> <li>Atanda.</li> <li>Q. Who is Megan Frisbie?</li> </ul>
5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes.  Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes.  Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know.  Q. Do you know what the documents are that were produced to the Department of	5 6 7 8 9 10 11 12 \$13 14 15 16 17	<ul> <li>A. Within the last three months.</li> <li>Q. How long was that meeting?</li> <li>A. Maybe 45 minutes.</li> <li>Q. Was it in person?</li> <li>A. No.</li> <li>Q. Was it over the phone?</li> <li>A. No.</li> <li>Q. Was it on videoconference?</li> <li>A. It was.</li> <li>Q. Who else attended the interview?</li> <li>A. Myself, Megan Frisbie, Danielle</li> <li>Atanda.</li> <li>Q. Who is Megan Frisbie?</li> <li>A. Megan Frisbie is the Annalect lead</li> </ul>
5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know. Q. Do you know what the documents are that were produced to the Department of Justice in connection with that	5 6 7 8 9 10 11 12 \$13 14 15 16 17	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena? A. I do not know. Q. Do you know what the documents are that were produced to the Department of Justice in connection with that investigation?	5 6 7 8 9 10 11 12 \$13 14 15 16 17 18	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB. Q. And who is Danielle Atanda?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes.  Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes.  Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know.  Q. Do you know what the documents are that were produced to the Department of Justice in connection with that investigation?  A. In total?	5 6 7 8 9 10 11 12 \$13 14 15 16 17 18 19 20	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB. Q. And who is Danielle Atanda? A. Danielle Atanda is the client
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes.  Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes.  Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know.  Q. Do you know what the documents are that were produced to the Department of Justice in connection with that investigation?  A. In total?  Q. Do you have a sense of what topics	5 6 7 8 9 10 11 12 \$13 14 15 16 17 18 19 20 21	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB. Q. And who is Danielle Atanda? A. Danielle Atanda is the client business lead for OMD on Team DDB at The U.S.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know. Q. Do you know what the documents are that were produced to the Department of Justice in connection with that investigation?  A. In total? Q. Do you have a sense of what topics they covered?	5 6 7 8 9 10 11 12 \$13 14 15 16 17 18 19 20 21 22	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB. Q. And who is Danielle Atanda? A. Danielle Atanda is the client business lead for OMD on Team DDB at The U.S. Army.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know. Q. Do you know what the documents are that were produced to the Department of Justice in connection with that investigation?  A. In total? Q. Do you have a sense of what topics they covered? A. Yes.	5 6 7 8 9 10 11 12 \$13 14 15 16 17 18 19 20 21 22 23	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB. Q. And who is Danielle Atanda? A. Danielle Atanda is the client business lead for OMD on Team DDB at The U.S. Army. Q. How many well, were there
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Did Omnicom produce documents to the Department of Justice during that period of time, from 2019 to 2021?  A. Yes. Q. Were those documents produced in response to a subpoena or other legal process?  A. Yes. Q. Did Omnicom produce any document voluntarily without a subpoena?  A. I do not know. Q. Do you know what the documents are that were produced to the Department of Justice in connection with that investigation?  A. In total? Q. Do you have a sense of what topics they covered?	5 6 7 8 9 10 11 12 \$13 14 15 16 17 18 19 20 21 22	A. Within the last three months. Q. How long was that meeting? A. Maybe 45 minutes. Q. Was it in person? A. No. Q. Was it over the phone? A. No. Q. Was it on videoconference? A. It was. Q. Who else attended the interview? A. Myself, Megan Frisbie, Danielle Atanda. Q. Who is Megan Frisbie? A. Megan Frisbie is the Annalect lead for The U.S. Army business at Team DDB. Q. And who is Danielle Atanda? A. Danielle Atanda is the client business lead for OMD on Team DDB at The U.S. Army.

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LAMBERT - HIGHLY CONFIDENTIAL  Q. Do you know how many?  A. No.  Q. More than one?  A. I don't know.  Q. Do you remember who any of the DOJ 6 lawyers were that were there?  A. I don't.  Q. Do you remember if there was anyone there from the states there are plaintiffs in this case?  A. I do not believe there was anyone from states that were plaintiffs.  Q. Was there anyone there besides the people you've mentioned from Omnicom, yourself, Megan Frisbie, Danielle Atanda and lawyers from the Department of Justice?  A. There was a gentleman that was presented as either an economist or at least a data analyst.  Q. Who else was there?  Q. Did you take document that meeting, or did you give the first meeting.  A. This is the first meeting?  A. We did not bring any de to that meeting. We brought of the Department of you about anything besides can related to the Army?  A. Yes.  Q. What else did they ask A. General ecosystem, to what would be in the columns campaign reports.  Q. Did they pask in the Call and and the campaign report.  Q. What products were in the campaign report?  A. DV360 would be a probe in there. Ads would be in the server would be in there.  Q. Did you take document that meeting?  A. This is the first meeting.  A. This is the first meeting.  A. We did not bring any decomplement of the campaign report.  A. This is the first meeting.  A. This is the first meeting.  A. We did not bring any decomplement of the campaign report.  A. This is the first meeting.  A. We did not bring any decomplement of the campaign report.  A. We did not bring any decomplement of the products were in the campaign report.  A. DV360 would be a probe in th	Justice ask mpaign reports you about? understand of these ions about headers of duct that would here. The ad ts with you for he Department ction with that
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9 Q. Do you remember if there was anyone 10 there from the states there are plaintiffs in 11 this case? 12 A. I do not believe there was anyone 13 from states that were plaintiffs. 14 Q. Was there anyone there besides the 15 people you've mentioned from Omnicom, 16 yourself, Megan Frisbie, Danielle Atanda and 17 lawyers from the Department of Justice? 18 A. Yes. 19 Q. Who else was there? 20 A. There was a gentleman that was 21 presented as either an economist or at least 22 a data analyst. 23 Q. And what was his name? 24 A. I don't recall. 25 Q. Did he speak in the meeting or just  Page 227  1 LAMBERT - HIGHLY CONFIDENTIAL  9 campaign reports. Q. Did they ask you questing Google products? A. Only those that were in the campaign report? A. Only those that were in the campaign report? A. DV360 would be a product be in there. Ads would be in there. Q. Did you take document that meeting, or did you give the of Justice documents in connecting? A. This is the first meeting? A. We did not bring any description.  Page 227  1 LAMBERT - HIGHLY CONFIDENTIAL  1 LAMBERT - HIGHLY CONFIDENTIAL	ions about headers of headers of duct that would here. The ad ts with you for he Department ction with that
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people you've mentioned from Omnicom, yourself, Megan Frisbie, Danielle Atanda and lawyers from the Department of Justice?  A. DV360 would be a profile be in there. Ads would be in the server would be in there.  A. Yes.  Q. Who else was there?  A. There was a gentleman that was presented as either an economist or at least a data analyst.  Q. And what was his name?  A. I don't recall.  Q. Did he speak in the meeting or just  The campaign report?  A. DV360 would be a profile in there. Ads would be in there.  Q. Did you take document that meeting, or did you give the of Justice documents in connecting?  A. This is the first meeting Q. Yeah.  A. We did not bring any description.  Page 227  LAMBERT - HIGHLY CONFIDENTIAL  LAMBERT - HIGHLY CONFIDENTIAL	duct that would here. The ad ts with you for the Department cition with that
yourself, Megan Frisbie, Danielle Atanda and la A. DV360 would be a product lawyers from the Department of Justice?  A. Yes.  Q. Who else was there?  A. There was a gentleman that was presented as either an economist or at least a data analyst.  Q. And what was his name?  A. I don't recall.  Q. Did you take document that meeting, or did you give the presented as either an economist or at least analyst.  Q. And what was his name?  A. I don't recall.  Q. Yeah.  A. We did not bring any description.	ts with you for the Department ction with that
lawyers from the Department of Justice?  A. Yes.  Q. Who else was there?  A. There was a gentleman that was presented as either an economist or at least Q. And what was his name?  Q. And what was his name?  A. I don't recall. Q. Did you take document that meeting, or did you give the of Justice documents in connect meeting?  A. This is the first meeting Q. Yeah.  Q. Yeah.  A. We did not bring any description.  LAMBERT - HIGHLY CONFIDENTIAL  LAMBERT - HIGHLY CONFIDENTIAL	ts with you for the Department ction with that
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Q. Who else was there?  A. There was a gentleman that was presented as either an economist or at least a data analyst.  Q. Did you take document that meeting, or did you give the of Justice documents in connect meeting?  Q. And what was his name?  Q. Did you take document that meeting, or did you give the of Justice documents in connect meeting?  A. I don't recall.  Q. Yeah.  Q. Yeah.  Q. Yeah.  A. We did not bring any description.  Page 227  LAMBERT - HIGHLY CONFIDENTIAL  LAMBERT - HIGHLY CONFIDENTIAL	he Department ction with that g?
A. There was a gentleman that was presented as either an economist or at least a data analyst.  Q. And what was his name?  A. I don't recall.  Q. Did he speak in the meeting or just  A. We did not bring any d  LAMBERT - HIGHLY CONFIDENTIAL  Confidence that meeting, or did you give the first meeting of Justice documents in connect meeting?  A. This is the first meeting Q. Yeah.  A. We did not bring any d  LAMBERT - HIGHLY CONFIDENTIAL	he Department ction with that g?
presented as either an economist or at least a data analyst.  Q. And what was his name?  A. I don't recall.  Q. Did he speak in the meeting or just  Page 227  LAMBERT - HIGHLY CONFIDENTIAL  21 of Justice documents in connect meeting?  A. This is the first meeting Q. Yeah.  A. We did not bring any d	ection with that
22 a data analyst. 23 Q. And what was his name? 24 A. I don't recall. 25 Q. Did he speak in the meeting or just  Page 227  1 LAMBERT - HIGHLY CONFIDENTIAL  20 meeting? 22 Meeting? 23 A. This is the first meeting Q. Yeah. 24 Q. Yeah. 25 A. We did not bring any d	<u>;</u> ?
Q. And what was his name?  A. I don't recall.  Q. Yeah.  Q. Did he speak in the meeting or just  Page 227  LAMBERT - HIGHLY CONFIDENTIAL  A. This is the first meeting Q. Yeah.  A. We did not bring any d	
24 A. I don't recall. 25 Q. Did he speak in the meeting or just 26 A. We did not bring any d  Page 227  1 LAMBERT - HIGHLY CONFIDENTIAL 1 LAMBERT - HIGHLY CONFIDENTIAL	
Q. Did he speak in the meeting or just 25 A. We did not bring any d  Page 227  LAMBERT - HIGHLY CONFIDENTIAL 1 LAMBERT - HIGHLY CONFIDENTIAL	•
Page 227  1 LAMBERT - HIGHLY CONFIDENTIAL 1 LAMBERT - HIGHLY CO	•
1 LAMBERT - HIGHLY CONFIDENTIAL 1 LAMBERT - HIGHLY CO	ocumentation
	Page 229
2 listened? 2 to that meeting. We brought o	NFIDENTIAL
3 A. The meeting was effectively a 3 Q. Did the Department of	
4 conversation between us and him. 4 already have campaign reports	?
5 Q. Did you have a lawyer there? 5 A. Yeah.	
6 A. Yes. 6 Q. Did you look at any car	mpaign
7 Q. Who was there with you? 7 reports during the meeting?	
8 A. These two gentleman to my left. 8 A. With the Department of	f justice,
9 Q. I'm not surprised. 9 like looked at them on screen?	
What did you talk about in that 10 Q. Yes, like on screen.	
11 meeting? 11 A. No.	
12 A. Campaign reporting. 12 Q. Did the Department of	
Q. What kinds of questions did the 13 reference any specific campaig	gn reports that
Department of Justice ask you about campaign 14 they were asking you about?	
15 reporting? 15 A. They didn't know what	campaign
16 A. Can you provide campaign reports 16 reports were.	
17 across all Google investments and 17 Q. What did they ask you	about, the
18 activations. 18 general ecosystem besides the	headers in the
19 Q. Is that specifically in connection 19 campaign reports?	
20 with the Army? 20 A. Similar to this conversa	ation, how
21 A. It was. 21 we buy, what we buy, specification	ally for The
Q. Do you think that was in the last 22 U.S. Army activations.	
23 three months, so some time between May and 23 Q. Then did they show you	
	u any
24 now? 24 documents during that meeting	-

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	Indie1 con		·
	Page 230		Page 232
1	LAMBERT - HIGHLY CONFIDENTIAL	1	LAMBERT - HIGHLY CONFIDENTIAL
2	Q. Let's talk about the second	2	course of the history of the client.
3	meeting. When was that?	3	Q. And you're talking about data
4	A. Within I believe a week or two,	4	specifically related to Omnicom's
5	maximum.	5	relationship with the Army?
6	Q. Of the first meeting?	6	A. Yes.
7	A. Yes.	7	Q. And the data that they were looking
8	Q. So you the first meeting and a week	8	for covered the entirety of the relationship,
9	or two later you had a second meeting?	9	so going all the way back like five years?
10	A. That's correct.	10	A. Yes.
11	Q. How long was that meeting?	11	Q. When was the first time that they
12	A. Again maybe 45 minutes, under an	12	asked you for this data?
13	hour.	13	A. In the first meeting.
14	Q. Was it also on video conference?	14	Q. Did they serve you with a document
15	A. It was.	15	subpoena before the first meeting?
		16	A. I was not served.
16	Q. Was it attended also by Megan		
17	Frisbie and Danielle Atanda?	17	Q. Do you know if Omnicom received a
18	A. I don't know if Danielle joined. I	18	document subpoena before the first meeting?
19	wanna say, yes. And definitely Megan	19	A. I do not know.
20	Frisbie.	20	Q. Besides the volume of data, what
21	Q. Were there lawyers for the	21	else did you discuss in the second meeting?
22	Department of Justice also at that meeting?	22	A. How the volume of data would not
23	A. I want to say, yes, because I	23	provide them the insight that I think they
24	assume these people were lawyers, but I	24	were looking for, nor could they tell us what
25	cannot recall being introduced to lawyers.	25	they needed so that we can make it easy on
	Page 231		Page 233
1	LAMBERT - HIGHLY CONFIDENTIAL	1	LAMBERT - HIGHLY CONFIDENTIAL
2	Q. Were there people from the	2	them.
3	Department of Justice there?	3	Q. What is the insight you think they
4	A. Yeah.	4	were looking for?
5	Q. Was the economist/data analyst that	5	A. I quite literally think they wanted
6	you mentioned also there?	6	to know, column by column, what impressions
7	A. Yep.	7	were being, quite literally a campaign
8	Q. Were there any other experts like	8	report, where were the dollars moving and
9	that?	9	why.
10	A. No.	10	Q. Did you take documents to that
11	Q. Was anyone else there besides your	11	meeting?
	- •		•
12	counsel?	12	A. We did.
13	A. No.	13	Q. What documents did you take?
1 4	O M	14	A. We brought a template to see if the
14	Q. No one from the states?		
15	A. No.	15	template would be something that would
15 16	<ul><li>A. No.</li><li>Q. What did you talk about in that</li></ul>	15 16	template would be something that would suffice.
15 16 17	A. No. Q. What did you talk about in that meeting?	15 16 17	template would be something that would suffice.  Q. And when you say "a template," are
15 16 17 18	<ul><li>A. No.</li><li>Q. What did you talk about in that meeting?</li><li>A. The volume of data and how we could</li></ul>	15 16 17 18	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?
15 16 17	A. No. Q. What did you talk about in that meeting?	15 16 17	template would be something that would suffice.  Q. And when you say "a template," are
15 16 17 18	<ul><li>A. No.</li><li>Q. What did you talk about in that meeting?</li><li>A. The volume of data and how we could</li></ul>	15 16 17 18	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?
15 16 17 18 19	<ul><li>A. No.</li><li>Q. What did you talk about in that meeting?</li><li>A. The volume of data and how we could actually produce what they really needed.</li></ul>	15 16 17 18 19	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?  A. Yes.
15 16 17 18 19 20	<ul> <li>A. No.</li> <li>Q. What did you talk about in that meeting?</li> <li>A. The volume of data and how we could actually produce what they really needed.</li> <li>Q. What data were they looking for?</li> <li>A. All of it.</li> </ul>	15 16 17 18 19 20	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?  A. Yes.  Q. And when you refer to "a template,"
15 16 17 18 19 20 21	<ul><li>A. No.</li><li>Q. What did you talk about in that meeting?</li><li>A. The volume of data and how we could actually produce what they really needed.</li><li>Q. What data were they looking for?</li></ul>	15 16 17 18 19 20 21	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?  A. Yes.  Q. And when you refer to "a template," are you talking about something that didn't exist but that you created for the meeting?
15 16 17 18 19 20 21 22	A. No. Q. What did you talk about in that meeting? A. The volume of data and how we could actually produce what they really needed. Q. What data were they looking for? A. All of it. Q. When you say "All of it," what do you mean?	15 16 17 18 19 20 21 22 23	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?  A. Yes.  Q. And when you refer to "a template," are you talking about something that didn't exist but that you created for the meeting?  A. We did create this template for
15 16 17 18 19 20 21 22 23	<ul> <li>A. No.</li> <li>Q. What did you talk about in that meeting?</li> <li>A. The volume of data and how we could actually produce what they really needed.</li> <li>Q. What data were they looking for?</li> <li>A. All of it.</li> <li>Q. When you say "All of it," what do</li> </ul>	15 16 17 18 19 20 21 22	template would be something that would suffice.  Q. And when you say "a template," are you talking about a template campaign report?  A. Yes.  Q. And when you refer to "a template," are you talking about something that didn't exist but that you created for the meeting?

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Table 233 LAMBERT - HIGHLY CONFIDENTIAL Q. Did you provide the template to the them?  Department of Justice, or did you give it to the them?  A. Yes.  Did they ask you for additional documents after that meeting?  A. They never even asked us to fill in the template.  Did they ask you ony questions about Google at the second meeting?  A. It was the crux of the conversation was Google templates, Google data, campaign reports.  Did they ask you for any information about Google at the was not data related?  A. No.  Did they ask you for opinions about Google?  A. No.  Did they ask you for opinions about Google?  A. No.  Did they ask you for opinions about the possibility of being a wilness at the trial in this case?  A. Yes.  LAMBERT - HIGHLY CONFIDENTIAL counsel.  Did they ask you for opinions about the possibility of being a wilness at the trial in this case?  A. Yes.  D. What was that conversation?  A. Wa ear talking about the Arys.  A. Wa are talking about the part the thing that we are doing today, that was all today? Are they have the same thing? I don't know.  D. Did you have a conversation about, if your counsel had any meetings with the Department of Justice was the meeting?  A. I do not know, but I do not think so.  Q. Did you have a conversation about, if your counsel had any meetings with the Department of Justice without you?  MR. LYNCH: Wait. Hold on, I just was ting about. A you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you know whether, it's a yes or no question: Do you was was a the nor think if we have the last with the Department of like three minutes so we can go talk and Page 237  MR. LYNCH: Do you want us just to				
Department of Justice, or did you give it 10 the therm?  A. Yes.  Did they ask you for additional documents after that meeting?  A. They never even asked us to fill in the template.  Did they ask you any questions  A. It was — the crux of the data, campaign pata, campaign pat	1		1	
Department of Justice, or did you give it to them?  A. Yes.  Q. Did you give it also to the economist?  A. Yes.  Q. Did they ask you for additional documents after that meeting?  A. They never even asked us to fill in the template.  Q. Did they ask you any questions about Google at the second meeting?  A. It do not know, but I do not think so.  Q. Did you have a conversation about, if your counsel had any meetings with the Department of Justice without you?  M. LYNCH: Wait. Hold on. I just want to make sure you're not asking for any attorney-client communications between us.  MS. MORGAN: I'm not asking for any privileged communications.  A. No.  Q. Did they ask you for any information about Google that was not data time the provided at a campaign data, campaign reports.  Q. Did they ask you for any information about Google that was not data time the provided at a campaign reports.  Q. Did they ask you for opinions about greated?  A. No.  Q. Did they ask you for opinions about greated?  LAMBERT - HIGHLY CONFIDENTIAL talk to you about the possibility of being a witness at the trial in this case?  LAMBERT - HIGHLY CONFIDENTIAL talk to you are talking about the Army portion or the thing that we are doing to day, that was all today? Are they have the same thing? I don't know.  Q. I guess let me try to like zoom out for a second.  You said that the Department of potentially being a trial witness in this case. When did that conversation happen?  A. I asked counsel within the last two weeks what the next kind of procedural step is after a deposition.  You point?  A. They never even asked us to fill in the dempth. Lamber and the procedural step is after a deposition.  Jo Did over that was an other that the poper timent of Justice without you?  A. No.  Q. Did they ask you for opinions about the warn use of the record.  A. No.  A. Yes.  J. A. No.  A. Yes.  J. A. No.  A. We are talking about - two different meetings, I want to make sure that I know which—you are talking about the Army portion or the thing that we are doing				
them?  A. Yes. Q. Did you give it also to the economist? A. Yes. Q. Did they ask you for additional documents after that meeting? A. They never even asked us to fill in the template. Q. Did they ask you any questions about google at the second meeting? A. It was – the crux of the conversation was Google templates, Google data, campaign reports. Q. Did they ask you for any information about Google that was not data related? A. No. Q. Did they ask you for any information about Google that was not data related? A. No. Q. Did they ask you for any information about Google that was not data related? A. No. Q. Did they ask you for any information about Google that was not data related? A. No. Q. Did they ask you for opinions about Google? A. No. Q. Did they ask you for opinions about Google? A. No. Q. Did they ask you for opinions about a related? A. No. Q. Did they ask you for opinions about Google? A. No. Q. Did they ask you for opinions about for like three minutes so we can go talk and with the Army portion or the thing that we are doing to today, that was all today? Are they have the same thing? I don't know.  A. We are talking about the Army portion or the thing that we are doing to today, that was all today? Are they have the same thing? I don't know.  Q. I guess let me ry to like zoom out for a second.  A. We are talking about the potentially being a trial witness in this case. When did that conversation happen? A. I asked counsel within the last two weeks what the next kind of procedural step is after a deposition.  Q. Did you talk about whether you would be a trial witness with the Department of Justice, or did you only talk about it with the Department of Justice about data. To be clear, did Omnicom have data that shows purchases on Army's behalf through Google products?  A. They never usade to the Labertment of Justice about data. To be clear, did Omnicom have data that shows purchase son Army's behalf through Google products?  A. Yes. Q. Did you talk about whether you would be a trial witness with the Dep				
5 A. Yes. 6 Q. Did you give it also to the 7 economist? 8 A. Yes. 9 Q. Did they ask you for additional 10 documents after that meeting? 11 A. They never even asked us to fill in 12 the template. 13 Q. Did they ask you any questions 14 about Google at the second meeting? 15 A. It wasthe crux of the 16 conversation was Google templates, Google 17 data, campaign data, campaign reports. 18 Q. Did they ask you for any 19 information about Google that was not data 20 related? 21 A. No. 22 Q. Did they ask you for opinions about 23 Google? 24 A. No. 25 Q. Did they ask you for opinions about 26 Google? 27 A. No. 28 A. I do not know, but I do not think 29 so. 30 WR. LYNCH: Wait. Hold on. I just 40 want to make sure you're not asking for any 41 setween us. 41 MS. MORGAN: I'm not asking for any 42 privileged communications. 43 Q. Did they ask you for any 44 A. No. 45 Q. Did they ask you for opinions about 45 Google? 46 A. Yes. 47 Yes. 48 A. Yes. 49 A. Yes. 40 Q. Did the Department of Justice ever 40 Justice without you? 40 A. No. 41 LAMBERT - HIGHLY CONFIDENTIAL 42 talk to you about the possibility of being a 40 wilness at the trial in this case? 40 A. Yes. 41 LAMBERT - HIGHLY CONFIDENTIAL 42 talk to you about the possibility of being a 41 Wilness at the trial in this case? 42 A. Yes. 43 A. Yes. 44 A. Yes. 45 Q. What was that conversation? 46 A. We are talking about - two 47 different meetings, I want to make sure that 48 I know which - you are talking about the 49 Army portion or the thing that we are doing today, that was all today? Are they have the same thing? I don't know. 40 A. They now a some point about for a second. 41 You said that the Department of Justice without you at any point of the record for like three minutes so we can go talk and the possibility of being a witness at the trial in this case? 42 A. Yes. 43 A. Yes. 44 A. Yes. 45 Q. What was that conversation? 46 A. Yes. 57 Q. What was that conversation? 58 A. I do not know thet the Department of Justice without you? 59 Justice aloud in this bepared to t			ı	· · · · · · · · · · · · · · · · · · ·
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A. I only spoke about it with my 25 MS. CLEMONS: Objection to form.		with your counsel?	24	behalf so Army can access it?
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60 (Pages 234 - 237)

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	Page 238		Page 240
1	LAMBERT - HIGHLY CONFIDENTIAL	1	LAMBERT - HIGHLY CONFIDENTIAL
2	A. It is.	2	EXAMINATION BY
3	And I also want to edit my answer.	3	MS. CLEMONS:
4	I believe they purge after three years on	4	Q. Mr. Lambert, I am going to ask you
5	data.	5	to refer back to Exhibit 1, if you have that
6	And I wanted to clarify, we had a	6	somewhere available.
7	question with like a bit of a hanging chat on	7	THE WITNESS: I gave them all to
8	did I talk to them about being a witness.	8	the court reporter.
9	Q. Oh, yeah.	9	Thank you.
10	A. I talked with my counsel about	10	Q. Do you recall testifying earlier
11	being in the next stage in this, about could	11	about this document?
12	I be called as a witness for whatever that	12	A. I do.
13	next round is, and they said, yes, Google or	13	Q. And you described this document as
14	the DOJ could do that and I said okay.	14	a tactical recommendation or reco I think is
15	Q. Thank you for the clarification.	15	the term you used; is that right?
16	So you have data, Omnicom has data	16	A. That's correct.
17	going back at least three years that shows	17	Q. So is it fair to say, based on the
18	purchases on Army's behalf for Google's	18	title of this document and the use of
19	products?	19	recommendation throughout, that this was not
20	A. Yes.	20	a final approved plan at the time that DDB
21	Q. Did you offer that data to the	21	created the document?
22	Department of Justice?	22	A. That's exactly
23	A. That would be the template we were	23	MS. MORGAN: Objection, form.
24	speaking about.	24	MR. LYNCH: You can answer.
25	Q. And you said that after the second	25	A. That's exactly right.
1	Page 239		Page 241
$\frac{1}{2}$	LAMBERT - HIGHLY CONFIDENTIAL	1	LAMBERT - HIGHLY CONFIDENTIAL
$\begin{vmatrix} 2 \\ 2 \end{vmatrix}$	meeting you had with the Department of	2	Q. So could DDB or OMD execute any of
3	Justice, they never followed up with you on	3	the recommendations in this document without
4	getting that template?	4	Army's approval?
5	A. That's correct.	5	A. No.
6 7	MS. CLEMONS: Objection, form,	6	Q. How often does your team at OMD
	foundation.	7	communicate with representatives of Army?
8	A. That's correct.	8	MS. MORGAN: Objection, form.
9	Q. Do you know if DOJ has tried to get	9	A. Daily.
10	that data from Omnicom since your meeting?		Q. What kinds of communications do you
11 12	A. I do not believe they have.	11	have daily with representatives of Army?
13	MS. MORGAN: I have no further	12	A. Should I speak just to OMD or Team
13	questions for now. I'll just reserve	13	DDB?
15	the rest of my time.	14 15	<ul><li>Q. Start with OMD.</li><li>A. I don't think there's much</li></ul>
16	MR. LYNCH: Do you want take another break?	15 16	
17	MS. CLEMONS: If we could take like	16 17	difference. I just want to be clear.
18		18	OMD has, you know, standing
19	ten minutes, that would be helpful.  MR. LYNCH: Sure.		statuses. They have reviews. We have, you
20	THE VIDEOGRAPHER: The time is	19 20	know, retrospectives and scrums. There is
$\begin{vmatrix} 20 \\ 21 \end{vmatrix}$		20 21	just standing meetings, and then there is
$\begin{vmatrix} 21\\22\end{vmatrix}$	3:49 p.m. and we are going off the record.		review meetings that happen as well.
22 23		22	Q. What kinds of topics are discussed
23	(A brief recess was taken.) THE VIDEOGRAPHER: The time is	23	at the review meeting?  A. Tactical recommendations are
25	4:09 p.m. We are back on the record.	24 25	A. Tactical recommendations are discussed, current performance and trends are
	A UZ D DE VVE ALE DACK ON THE FECORD	4.1	discussed, current performance and trends are

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# Federal Rules of Civil Procedure Rule 30

- (e) Review By the Witness; Changes.
- (1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:
- (A) to review the transcript or recording; and
- (B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.
- (2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES

ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1,

2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES

OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

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